25711 Southfield Road, Southfield, Michigan 48075, Telephone 313 424-8860

July 31, 1984

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Mr. William L. Sago, P.E. Vice President RUSSELL & AXON #1 American Bottoms Road Sauget, IL 62201

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CEC Job No. 20666-15

Dear Mr. Sago:

At your request, I visited the American Bottoms construction site in Sauget, Illinois on May 20, 1984. The purpose of this visit was to review with you a recent problem involving some chemical wastes uncovered during excavation at the site. As we uncerstand the situation, workers digging a trench (and laying a potable water pipeline) at a location approximately 200 feet northeast of the R&A field office, uncovered the suspect material. When you became aware of the situation you ordered work discontinued, the trench filled and the pipe already laid in this area, abandoned. Subsequently, a new route was selected for the pipe. During my visit, small quantities of material were exposed at several locations and two samples were collected. Subjectively, the material was a black tar-like substance. The apparent source was the adjacent #4 lagoon. The material was 'similar in both appearance and odor to materials observed during excavations in the summer of 1983 between the abandoned lagoons and Clayton Chemical Company.

The samples collected were submitted for analyses to Envirodyne Engineers, as you instructed. Samples were analyzed for PCBs, benzene, phenol, and oil and grease, and the results are presented in the following table.

	Sample No. 1	Sample No. 2
Total PCB	477 ppm	653 ppm
Benzen e	1 ppb	l ppb
Phenol	0.28 p _k .m	12. ppm
Oil and grease	29 %	35%
Solids	82.2%	87.3%

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mr. William L. Sago, P.E. Russell & Axon

It appears from our conversation that direct contact with the material by workers did not occur. However, the potential problem had been abated before I arrived at the site. It is not possible to assess the extent of worker exposure in this situation.

As previously indicated, some of the material was exposed during my visit. We recommend that this be covered with uncontaminated top soil or removed. In our recent telephone conversation, you indicated the materials were covered.

Should any additional excavation be required near the lagoons, we recommend prior planning and careful review to prevent a similar problem from occurring.

Sincerely.

Michael A. Coffman, C.I.H.

Indujstrial Hygienist

Approved by:

Richard J. Walcott, C.I.H.
Assistant Vice President
Manager, Industrial Hygiene Services

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